

# **EXHIBIT 57**



<p>1 Q And when you say "the parties," do</p> <p>2 you mean the NFL Management Council and the NFLPA?</p> <p>3 A That's correct. They agree on</p> <p>4 neutral physicians.</p> <p>5 Q Who submits neutral physicians to the</p> <p>6 NFL Management Council and the NFLPA for</p> <p>7 consideration?</p> <p>8 A That primarily comes through me.</p> <p>9 Q Okay. And how do you go out and find</p> <p>10 Plan doctors?</p> <p>11 A We have a group of consultants of</p> <p>12 various specialties. So depending on what our</p> <p>13 needs are for a certain specialist in a certain</p> <p>14 area, for example city, state, we will refer to</p> <p>15 them to see if there is a person that they may know</p> <p>16 that could participate in our plans.</p> <p>17 Q Who are those consultants?</p> <p>18 A Let me write this down so I make sure</p> <p>19 I won't skip anybody at the same time. We have our</p> <p>20 medical director, orthopedist Dr. Aakash Shah. We</p> <p>21 have another consultant orthopedist, Dr. Harlan</p> <p>22 Selesnick. We have our consulting</p> <p style="text-align: right;">Page 174</p>	<p>1 the same page with how it's worded, do you all call</p> <p>2 them neutral physician?</p> <p>3 A Yes, that's correct.</p> <p>4 Q So if I say "the neutrals" or "the</p> <p>5 neutral physicians," those will be the people that</p> <p>6 you understand to be the Plan doctors. Is that</p> <p>7 correct?</p> <p>8 A Yes. I will understand that, yes.</p> <p>9 Q How is the Plan funded?</p> <p>10 A By the Management Council -- I'm</p> <p>11 sorry, the league owners.</p> <p>12 Q And so correct me if I'm wrong, and</p> <p>13 tell me -- point out if I've said anything</p> <p>14 incorrectly just so I can put this in a bottle for</p> <p>15 a second.</p> <p>16 The NFL Management Council and the</p> <p>17 NFLPA negotiate and they come to a CBA and</p> <p>18 ultimately there's an agreement on the distribution</p> <p>19 of revenue, correct?</p> <p>20 A Correct.</p> <p>21 Q And out of that distribution of</p> <p>22 revenue, where does the disability Plan benefits</p> <p style="text-align: right;">Page 176</p>
<p>1 neuropsychologist, Dr. Bill Garmoe. We have our</p> <p>2 consulting neuropsychologist, Dr. Stephen</p> <p>3 Macciocchin. We have our consulting psychiatrist,</p> <p>4 Dr. Steve Epstein. We have our consulting</p> <p>5 neuropsychologist and psychiatrist Dr. Silvana</p> <p>6 Riggio. That's the group.</p> <p>7 Q All right. As I heard what you said</p> <p>8 the consultants were referenced were Dr. Shah, Dr.</p> <p>9 Selesnick, Dr. Garmoe -- sorry, the consultant are</p> <p>10 Dr. Shah, Dr. Selesnick, Dr. Garmoe,</p> <p>11 Dr. Macciocchin, Dr. Epstein, and Dr. Riggio?</p> <p>12 A Riggio, R-I-G-G-I-O.</p> <p>13 Q Riggio.</p> <p>14 A Yes.</p> <p>15 Q Was anybody else correct?</p> <p>16 A Yes.</p> <p>17 Q Or I marginally said it closely?</p> <p>18 A Yes, it was pretty close.</p> <p>19 Q Okay. Who pays the neutral doctors?</p> <p>20 A It comes out of the Plan, disability</p> <p>21 Plan.</p> <p>22 Q And just so we're clear and we're on</p> <p style="text-align: right;">Page 175</p>	<p>1 money come from?</p> <p>2 So I see you looking through the</p> <p>3 document that's been marked Exhibit 20. Do you not</p> <p>4 know that answer without consulting your binder?</p> <p>5 A I understand that contributions are</p> <p>6 made through the employer to The Plan.</p> <p>7 Q Okay. So if I understand you</p> <p>8 correctly, the employer would be --</p> <p>9 A NFL owners.</p> <p>10 Q -- the league through the owners,</p> <p>11 correct?</p> <p>12 A Correct.</p> <p>13 Q Is there an annual amount that's</p> <p>14 distributed from the owners to The Plan?</p> <p>15 A I'm not sure of the annual amount.</p> <p>16 Q I'm saying, is there an annual</p> <p>17 amount? Is there a set amount?</p> <p>18 A I do not know the answer.</p> <p>19 Q So you know it's funded by the</p> <p>20 owners, you just don't know if it's a set amount or</p> <p>21 if there's a determination of how that amount comes</p> <p>22 in. Is that correct?</p> <p style="text-align: right;">Page 177</p>